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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

BOARD OF TRUSTEES OF THE  
COMPOSITION ROOFERS LOCAL 4  
WELFARE FUND, BOARD OF TRUSTEES OF  
THE COMPOSITION ROOFERS LOCAL 4  
PENSION FUND, BOARD OF TRUSTEES OF  
THE COMPOSITION ROOFERS LOCAL 4  
ANNUITY FUND and BOARD OF TRUSTEES  
OF THE COMPOSITION ROOFERS LOCAL 4  
APPRENTICE INFORMATION AND  
EDUCATION FUND, and COMPOSITION  
ROOFERS LOCAL 4,

Plaintiffs,

vs.

RAMCO CONSTRUCTION, INC. RAMKO  
CONSTRUCTION, INC., and ABC  
CORPORATION, a fictitious company, DEF, LLC.  
a fictitious company, HOWARD RAMCO, as an  
individual, and JOHN ROE and JANE DOE, as  
fictitious individuals,

Defendants.

Civil Action No. 2:13-cv-06392-SDW-MCA

**CONSENT ORDER AND  
STIPULATION WITHDRAWING  
PLAINTIFFS' MOTION FOR  
DEFAULT JUDGMENT AND  
VACATING THE ENTRY OF  
DEFAULT**

IT IS HEREBY STIPULATED AND AGREED by and between the parties, acting by and  
through their undersigned counsel, that:


1. Plaintiffs' Motion to Enter Default Judgment, returnable January 16, 2014, is  
hereby withdrawn;

2. The Clerk's December 4, 2013 Entry of Default as to defendants Ramco Construction, Inc. and Ramko Construction, Inc. ("Corporate Defendants") in this matter is hereby VACATED and SET ASIDE, the parties to bear their own costs.

So Ordered:

  
Hon. Susan D. Wigenton, U.S.D.J.

Dated:

  
Jan 16, 2014

Stipulated And Consented To:

**COHEN, LEDER, MONTALBANO  
& GROSSMAN, L.L.C.**  
Attorneys for Plaintiffs

**LITTLER MENDELSON, P.C.**  
A Professional Corporation  
Attorneys for Defendants

By:

  
Paul A. Montalbano

By: /s/ Lauren J. Marcus

Lauren J. Marcus